

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

N.R., N.R. on behalf of T. R.,

Plaintiff,  
v.

1:07 Civ. 9648  
(BSJ/DCF)

THE DEPARTMENT OF EDUCATION OF THE  
CITY SCHOOL DISTRICT OF THE CITY OF  
NEW YORK, a/k/a,  
THE BOARD OF EDUCATION OF THE CITY  
SCHOOL DISTRICT OF THE CITY OF NEW  
YORK, and JOEL KLEIN, in his official capacity as  
Chancellor of the New York City School District,

**NOTICE OF MOTION**


Defendants.

PLEASE TAKE NOTICE that, upon this Notice of Motion, the accompanying Memorandum of Law in support thereof, Civil Rule 56.1 Statement of Material Facts Not in Dispute, and the Declaration of Caroline J. Heller and exhibits annexed thereto filed separately under seal pursuant to an Order of the Court dated March 17, 2008, Plaintiff N.R., before the Honorable Barbara S. Jones, United States District Court Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 18-B, New York, New York, moves for summary judgment, pursuant to Fed. R. Civ. P. Rules 56, finding that Plaintiff N.R. is entitled to tuition reimbursement as requested in N.R.'s Complaint dated October 30, 2007, attorneys' fees, and such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Report of Parties' Planning Meeting So Ordered by the Court on February 14, 2008, the parties shall serve and file any Opposition to dispositive motions on or before March 31, 2008, and any Reply on or before April 7, 2008.

Dated: March 17, 2008  
New York, New York

**GREENBERG TRAURIG, LLP**

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-and-

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